MEMORANDUM

SUBJECT: Phase II ESA Work Plan for Clinton Engines Jackson County Museum Parcel;

Maquoketa, Iowa – Approved with Condition

FROM: Diane Harris, Regional Quality Assurance Manager

Environmental Sciences and Technology Division

TO: Jennifer Morris, Project Officer

Brownfields and Land Revitalization Branch

Superfund Division

The review of the subject document prepared by Impact7G and dated July 6, 2017 has been completed according to the "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," EPA QA/R-5 March 2001. The document is a Phase II Work Plan to the previously approved "Phase I & Phase II Environmental Site Assessments DQOs and Generic Quality Assurance Project Plan ECIA Brownfields Redevelopment Project" (R7QAO Document Number: 2017112).

Based on the comments below, the document is approved with conditions. The document was found to be incomplete in addressing some key areas to the extent of potentially jeopardizing the quality of the data. These areas are fully described in this review memorandum as critical comments and can be adequately addressed by incorporation into the document but without resubmission. The document would not be approved without addressing these issues.

Critical Comments

- 1. § XI. Phase II Field Operations. It is not clear whose SOP was followed for the installation of the vapor pin and so could not be verified at the time of the review.
- 2. § XII. General Soil-Gas, Indoor Air, and Outdoor Air Inspection Procedure.
 - a. Because the generic QAPP does not address preservation or holding time for soil gas samples, this information needs to be included in the Phase II Work Plan or a reference added to where this information can be found.
 - b. Because the referenced U.S. Environmental Protection Agency guidance focuses on residential buildings and includes the collection of 24-hour composites, the Work Plan needs to provide the reason for choosing grab samples for this project.

3. § XIII. Quality Control Checks. Because the generic QAPP only addresses the acceptance criteria for soil and aqueous field duplicates, the Work Plan needs to describe how the soil gas duplicate sample for this project will be evaluated for acceptability.

CONCURRENCE: Jordi:7734:020218:H:/ENST/IO/QA/Estep/2018/2018056.mem.docx				
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If you have any questions, please contact me at x7258.

R7QAO Document Number: 2018056